



Steven F. Molo
MoloLamken LLP
430 Park Avenue
New York, NY 10022
T: 212.607.8160
F: 212.607.8161
smolo@mololamken.com

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VIA CM/ECF

Hon. P. Kevin Castel
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Red Tree Investments, LLC v. Petróleos de Venezuela, S.A. et al.*,
Nos. 19 Civ. 2519 and 19 Civ. 2523: Petition for Fees and Costs

Dear Judge Castel:

We represent Red Tree. We respectfully write regarding the Court's February 2 Order concerning Red Tree's motion for attorneys' fees and costs. Dkt. 155/156.¹ In response to a letter motion Defendants filed on February 1, *see* Dkt. 153/154, the February 2 Order directs Red Tree to "submit" and "produc[e]" daily time entries supporting its motion by February 23. Dkt. 155/156. The order also instructs the parties to meet and confer in an effort to resolve Red Tree's motion voluntarily. *Id.* The parties have done so, and it is Red Tree's hope that the matter will be resolved.

In the meantime, Red Tree is currently preparing the submission ordered by this Court. In doing so, Red Tree is redacting privileged material from the time entries. Red Tree has requested that Defendants produce their time entries, and Red Tree anticipates that privileged material will be redacted from those as well. Based upon our discussions with Defendants and our reading of this Court's Order, Red Tree understands that, on February 23, the parties will produce these time entries to one another and not file them on the docket. Of course, should the parties be unable to resolve the matter, it may become necessary to do so at a later date. Respectfully, if this manner of proceeding is inconsistent with what the Court intended in its February 2 Order, we ask that the Order be further clarified.

Respectfully submitted,

/s/ Steven F. Molo
Steven F. Molo

CC: All counsel of record via CM/ECF

¹ As with prior Red Tree filings, this letter cites docket numbers from the two cases as "Dkt. ##/##."